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OCT 28 2019

CLERK, U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTA
UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Abraham Embaye
Plaintiff(s),

vs.

Case No. 19 cv 2794 ECT/kmm
(To be assigned by Clerk of District Court)

Hennepin County Attorney's
Office/Civil & Forfeiture Unit
300 South 6th Street c-2000
mn, 55487

DEMAND FOR JURY TRIAL

YES ☐ NO ☐

Defendant(s).

(Enter the full name(s) of ALL defendants in
this lawsuit. Please attach additional sheets
if necessary).

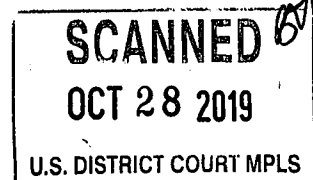
COMPLAINT

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff

Name Abraham Embaye
Street Address 2611 13th Ave South
County, City Hennepin, Minneapolis
State & Zip Code MN, 55407
Telephone Number 612-987-3325



2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1

Name Minneapolis Police Department/Hennepin County Attorney's
Office / Civil & Forfeiture Unit
Street Address
300 South 6th Street C-2000
County, City Hennepin, Minneapolis
State & Zip Code MN, 55487

b. Defendant No. 2

Name

Street Address

County, City

State & Zip Code

c. Defendant No. 3

Name

Street Address

County, City

State & Zip Code

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.d., 2.e., etc.)

JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? (*check all that apply*)

☒ Federal Question

☐ Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply.

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff Name:

State of Citizenship:

Defendant No. 1:

State of Citizenship:

Defendant No. 2:

State of Citizenship:

Attach additional sheets of paper as necessary and label this information as paragraph

5.

Check here if additional sheets of paper are attached. ☐

6. What is the basis for venue in the District of Minnesota? (*check all that apply*)



Defendant(s) reside in Minnesota



Facts alleged below primarily occurred in Minnesota



Other: explain

STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered

separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

7. On September 26th, 2019 Mpls police raided my home. While doing so they confiscated my 401K - Public Employee's Retirement Association's Contribution, in the amount of \$22,276.81, which was located inside my safe (in my home), which I have been saving since I received it in March of 2016. Even though \$35,172 was confiscated, the \$22,276.81 was of my own 401K contributions which was earned from years of employment at Hennepin County Medical Center,

Attach additional sheets of paper as necessary.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to as Additional Facts and continue to number the paragraphs consecutively.

REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

I would like for the \$22,276.81 to be released back in my possession, I have the paperwork from the Public Employee's Retirement Association which shows My Contribution, as well as my former employers Contribution, which was paid out to me and saved in my home. It should not have been seized as illegal monies earned.

Signed this A.E day of 10-28-19

Signature of Plaintiff Alre Emblayn

Mailing Address 2611 13th Ave South
Minneapolis, MN 55407

Telephone Number 612-987-3325

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.